

1 BRIAN J. STRETCH (CABN 163973)
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)
3 Chief, Criminal Division

4 JULIE D. GARCIA (CABN 288624)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7014
8 FAX: (415) 436-7234
Julie.Garcia@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	NO. CR 17-391 EMC
14 Plaintiff,)	
15 v.)	
16 NELSON DECUIRE, a/k/a "VADER," and)	STIPULATION TO EXCLUDE TIME AND
17 PAUL ROBERT BIDINGER,)	[PROPOSED] ORDER
18 Defendants.)	
19)	

20 **STIPULATION**

21 IT IS HEREBY STIPULATED, by and between the parties to this action, as stated on the record
22 at the status conference on August 23, 2017, that the time between August 23, 2017, and September 13,
23 2017, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B).
24 Excluding time until September 13, 2017, will allow defense counsel the reasonable time necessary for
25 effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C.
26 § 3161(h)(7)(B)(iv).

27 //

28 //

1 IT IS SO STIPULATED.

2 DATED: August 24, 2017

BRIAN J. STRETCH
United States Attorney

3
4 /s/

JULIE D. GARCIA
Assistant United States Attorney

5
6 DATED: August 24, 2017

7
8 /s/

RANDY SUE POLLOCK
Counsel for Defendant
NELSON DECUIRE

9
10
11 DATED: August 24, 2017

12
13 /s/

RANDOLPH E. DAAR
Counsel for Defendant
PAUL ROBERT BIDINGER

14
15
16 **~~PROPOSED~~ ORDER**

17 As explained on the record during the August 23, 2017 status conference, the Court finds that the
18 exclusion of the period from August 23, 2017, to September 13, 2017, from the time limits applicable
19 under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the continuance outweigh the
20 interests of the public and the defendant in the prompt disposition of this criminal case; and that the
21 failure to grant the requested exclusion of time would unreasonably deny defense counsel the reasonable
22 time necessary for effective preparation, taking into account the exercise of due diligence, and would
23 result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

24 IT IS SO ORDERED.

25
26 DATED: August 28, 2017

27 HON. EDWARD M. CHEN
United States District Judge

